

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Maureen	:	Chapter 13	
	Elizabeth Calder	:	No.	18-16521 AMC
		:		

OBJECTION TO CERTIFICATION OF DEFAULT

The Law Offices of Anthony A Frigo, attorneys for Debtors, hereby object to Movant's Certification of Default filed with the Court on November 23, 2022, based upon the following:

1. This case was filed under Chapter 13 on September 30, 2018.
2. During the pendency of the case Debtor fell behind on Post Petition Mortgage payments to Creditor M&T Bank.
3. M&T Bank filed a Motion for Relief from the Stay on June 26, 2019.
4. By Order entered on August 28, 2019 the motion was settled. A true and correct copy of the Order is attached hereto, made a part hereof and marked Exhibit "A."
5. On July 21, 2023 M&T Bank sent its NOTICE OF DEFAULT UNDER COURT APPROVED STIPULATION averring a deficiency in payments for June and July 2023. A true and correct copy of the Notice is attached hereto, made a part hereof and marked Exhibit "B."
6. Debtor has made all required payments under the stipulation.

WHEREFORE, the Debtors request that this Court deny Movant's Certification of Default.

Dated: August 14, 2023

/s/ Anthony A. Frigo
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